



December 8, 2008

Mr. Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Wayne Yoshioka
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Messrs. Matley and Yoshioka:

The Honolulu Chapter of the American Institute of Architects (AIA Honolulu) strongly supports the concept and implementation of a fixed guideway steel-on-steel rail system as an integral part of the future plans to meet the needs of our growing island communities. We therefore offer the following comments and recommendations to assist the City in strengthening community support, enhancing our neighborhoods and environment, investing taxpayer money wisely, and ensuring Federal funding for the project.

Review of Project Goals and Objectives

A recent study by AIA National and the Center for Transportation Studies found that ***“the success of transportation projects requires integrating transportation design with social, economic, and cultural resources. The time for looking at transportation projects through the single lens of mobility, or even simple access and connectivity, is long gone.”ⁱ*** However, Chapter 1 of the Draft EIS outlines project goals and objectives that are focused almost exclusively on mobility concerns.

AIA Honolulu therefore recommends that the current project goals should be expanded and integrated with stronger community-planning objectives. We encourage the use of social, environmental, and aesthetic criteria – as well as economic efficiency – in the planning and design of transit system routes and supporting facilities. Transit system routes and facilities should further support land use objectives – including urban growth management and efficient transit mode linkages – and respect significant human, cultural and natural environments as defined by the City’s Primary Urban Center Development Plan.

Other cities such as Portland, Salt Lake, and Sacramento have wisely integrated transportation, social, economic, and cultural objectives during the EIS process and as a result have built popular rail transit systems which not only transport people efficiently but also create desirable, livable communities. This emphasis on the bigger picture can best be summed up by the transit-planning protocol followed by Portland since the 1970’s: ***“We define what kind of place we want to be and then identify the appropriate transportation options to serve it.”ⁱⁱ***

Likewise, it is our understanding that the Federal Transportation Administration’s evaluation criteria for New Starts funding goes well beyond measuring mobility improvements. According to its *New Starts and Small Starts Evaluation and Rating Process*, proposed projects are graded against the full range of the following justification criteriaⁱⁱⁱ:

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- ***Transit Supportive Land Use Policies and Future Patterns***
- ***Environmental Benefits***
- ***Cost Effectiveness***
- ***Mobility Improvements***
- ***Operating Efficiencies***

We similarly recommend that the Honolulu Rail Transit project goals and objectives be amended to align closely with these key criteria in order to ensure qualification for Federal funding.

Additionally, because our island economy remains heavily dependent upon tourism, we feel it essential that the project objectives should address minimizing economic impact to the visitor industry and to our island's visual appeal. For instance, views from cruise ships and visitors' visual expectations of Hawaii, Honolulu, and Waikiki should be considered.

Review of Project Impacts

AIA Honolulu has also carefully reviewed the Draft EIS in relation to our chapter's public policies on transportation. We respectfully offer the following comments regarding the impacts an elevated guideway will have to our communities.

The City and County of Honolulu's Primary Urban Center Development Plan (PUC) is a comprehensive planning document mandated by the City's Charter to guide "the development and improvement of the City" into the year 2025.^{iv} The PUC clearly defines guidelines to ***"preserve and enhance significant mauka or makai view corridors along major collector streets."***^v Unfortunately, the proposed elevated rail structure will block mauka and makai view corridors particularly along Nimitz Highway through historic Chinatown and Downtown. Although the PUC provides criteria for protecting mauka views from the Ala Wai promenade^{vi}, the Draft EIS does not address visual impacts along the planned elevated segment serving the University of Hawaii at Manoa.

In addition, the PUC notes ***"as demonstrated in leading cities throughout the world, recapturing visual and physical access to the urban waterfront can stimulate economic renewal and be a source of civic pride."***^{vii} Examples of popular waterfront destinations that have removed their elevated transportation structures include San Francisco, Boston, Seattle, and Sydney. The PUC goes on to stress that a major impediment for Honolulu is Nimitz highway that ***"effectively acts as a physical and visual barrier cutting off the waterfront from mauka pedestrian travel."***^{viii} Elevated rail stations and structures along the waterfront will make a poor situation worse by introducing an additional physical and visual barrier. This will largely undo the tremendous past efforts by the State Department of Transportation to reintegrate the Aloha Tower with the rest of Downtown Honolulu.

AIA Honolulu also promotes the preservation and enhancement of historic and cultural districts such as Chinatown and the Hawaii Capital District. Our understanding is that the elevated Chinatown station and guideway structures would be approximately 40-50 feet above grade.^{ix} We therefore respectfully disagree with the finding that the elevated system will pose "no adverse effect" to our historic districts^x particularly when the Draft

EIS states that ***“the project elements would contrast substantially with Chinatown’s historic character”^{xi}*** and that through the Downtown area ***“the bulk and scale of the guideway would contrast with the more pedestrian scale [and] character of the streetscape.”^{xii}***

We are deeply concerned that despite documenting many of the significant visual and aesthetic impacts of the elevated guideway, the Draft EIS fails to propose mitigation measures to effectively counteract negative impacts on views, connection with the waterfront, historic districts, and pedestrian streetscapes. AIA Honolulu also recommends that rather than providing selective, localized views of the transit guideway and stations, broader visualization studies should also be performed. Panoramic mountain and waterfront views as defined by the PUC should be shown, keeping in mind the potential economic impact upon our tourist industry.

The AIA further advocates the creation of safe, healthy, and easily accessible environments for transit passengers as well as pedestrians and residents along the transit route. We are concerned that the areas below elevated rail structures and stations will become blighted, “nuisance” environments and that the lack of natural public sightlines into stations will diminish safety and security for passengers waiting on platforms. The proposed elevated platforms and concourses will also impede convenient access for both able-bodied and disabled users.

Finally, the AIA promotes sustainable planning, design, and operation of transit systems. Economic efficiency is also essential. The Draft EIS notes that it will take over 7 times the energy to construct an elevated guideway compared with an at-grade system.^{xiii} We wish to also emphasize that an elevated guideway will require substantially greater amounts of materials, construction, and time in comparison with at-grade systems. Similarly, elevated systems require increased electrical consumption to power elevators, escalators, and additional lighting. Increased and ongoing operating and maintenance costs for public restrooms, painting, graffiti mitigation, and landscaping should also be accounted for in life cycle cost estimates. AIA Honolulu therefore considers an elevated system to be the least sustainable and cost effective option available to our communities.

Recommendations

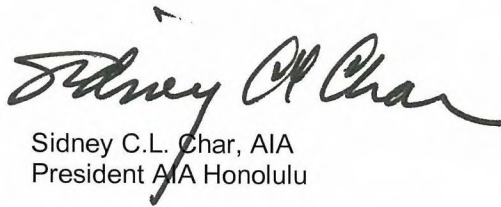
For these reasons, AIA Honolulu urges the City to consider a more flexible rail transit solution capable of running at, below, or above grade to accommodate the particular conditions within each community. Third rail technology should not be our only option. Widely used alternatives such as overhead lines would allow much greater flexibility and would more effectively accommodate social, economic, cultural, and community planning objectives. Flexible transit solutions would also more easily satisfy the FTA’s funding justification criteria for:

- Transit Supportive Land Use Policies and Future Patterns
- Environmental Benefits
- Cost Effectiveness
- Mobility Improvements
- Operating Efficiencies

Impacts to our visual, historic, and cultural resources would be mitigated. There would be fewer detrimental consequences for our tourist industry. More of the cultural indigenous character of our communities, neighborhoods, and pedestrian streetscapes would be preserved or even enhanced. Sustainable objectives would be more easily achieved with lower requirements for energy, material, construction, time, and cost. In comparison with elevated systems, at grade systems would require less taxpayer funding and offer greater flexibility and affordability in planning for future extensions.

AIA Honolulu sincerely thanks the City and County of Honolulu for this opportunity to offer our comments and recommendations publicly. We have enjoyed greater dialogue with the City on transit issues in recent months and we reaffirm our willingness to work together with the Mayor, his administration, its consultants, and the City Council on developing viable and effective regional community planning and urban design solutions for this historic project, including the possibility of alternative mass transit corridors.

Sincerely Yours,



Sidney C.L. Char, AIA
President AIA Honolulu

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- ⁱ Moving Communities Forward, p. 44
 - ⁱⁱ Community Building Sourcebook, Land Use and Transportation Initiatives in Portland Oregon, p. 1-4
 - ⁱⁱⁱ FY2009 New Starts and Small Starts Evaluation and Rating Process, p. 3
 - ^{iv} Primary Urban Center Development Plan (PUC), p. 1-1
 - ^v PUC, p. 3-12
 - ^{vi} PUC, p. 3-4, 3-5
 - ^{vii} PUC, p. 3-38
 - ^{viii} PUC, p. 3-39
 - ^{ix} Draft EIS, p. 2-24
 - ^x Draft EIS, Table 5-2, p. 5-7
 - ^{xi} Draft EIS, p. 4-77
 - ^{xii} Draft EIS, p. 4-82
 - ^{xiii} Draft EIS, p. 4-159